

PLUMLEY

ENGINEERING

Civil and Environmental Engineering

November 1, 2019

*** VIA FEDEX OVERNIGHT ***

Mr. Douglas McKenna
Chief, Compliance Section
Water Compliance Branch
Enforcement and Compliance Assurance Division
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 2
290 Broadway, 21st Floor
New York, New York 10007-1866

RE: Administrative Compliance Order and Information Request Response
Weitsman Shredding, LLC
Town of Owego, Tioga County, New York
CWA-02-2019-3046
NPDES Tracking No. NYR00D022
Project No. 2012069

Dear Mr. McKenna:

Plumley Engineering provides environmental compliance assistance for Weitsman Shredding, LLC. This letter provides additional responses to your September 12, 2019 letter regarding the July 18, 2109 Compliance Evaluation Inspection (CEI) at the above-referenced facility. The initial response to the request for information was submitted on October 17, 2019. This letter is providing responses to the following remaining items outlined in your letter:

Request: *Submit proposed Corrective Actions along with a schedule to address mercury effluent exceedances, benchmark exceedances and visual observations within 45 days (due November 2, 2019).*

Response: Refer to *Table 1 – Proposed Actions and Schedule*, attached.

Mr. Douglas McKenna
November 1, 2019
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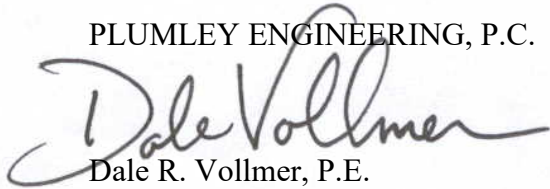
Request: *Submit proposed actions and schedule to address each Potential Non-Compliance items and Areas of Concern identified in the inspection report within 45 days (due November 2, 2019).*

Response: Refer to *Table 1 – Proposed Actions and Schedule*, attached.

Please let us know if you have any questions or require additional information. Thank you for your consideration in this matter.

Sincerely,

PLUMLEY ENGINEERING, P.C.

A handwritten signature in dark ink, reading "Dale Vollmer", is written over the printed name. The signature is fluid and cursive, with the first name "Dale" being more prominent.

Dale R. Vollmer, P.E.

DRV/cas

Attachments

cc: Mr. Steve McCague, P.E. (w/attachments) [via FEDEX Overnight]
Mr. Kevin Deet (w/attachments) [via e-mail: kdeet@weitsman.com]

WEITSMAN SHREDDING
USEPA Inspection and Order - September 2019
POTENTIAL NON-COMPLIANCE ITEMS AND AREAS OF CONCERN

TABLE 1 - PROPOSED ACTIONS AND SCHEDULE

Item	Action Needed	Schedule	Status	
Potential Non-Compliance Items				
1	Oil staining on concrete, leaking front end loader, poor housekeeping in maintenance garage area.	Cleanup spills promptly, store leaky equipment indoors or provide and maintain drip pans, improve exterior housekeeping in maintenance garage area. Retraining of employees and expanded inspection form.	Completed	Cleanup completed and photo documentation submitted on 7/12/2019. Training completed on 10/25/2019. Expanded monthly inspection forms being implemented. Copies attached.
2	Used oil stored outside without secondary containment, potentially leaking hydraulic equipment with oil staining on concrete	Eliminate exterior oil storage, provide secondary containment of oil storage (spill pallets for drums) , cleanup spills promptly. Retraining of employees and expanded inspection form.	Completed	All oil storage has been moved indoors, has appropriate secondary containment and photo documentation submitted on 7/12/2019. Training completed on 10/25/2019
3	Housekeeping related to dust and debris at various locations (Microfines, wire chopper baghouse, etc.)	Identify areas where hand sweeping is needed, establish routine schedule and tracking of sweeping activities.	Completed	Areas cleaned and photo documentation submitted on 7/12/2019. Training completed on 10/25/2019. Expanded monthly inspection form being implemented. Copies attached.
	Cover for aluminum turnings pile	Maintain tarp on aluminum turnings pile or move turnings storage to covered bunker.	Completed	The turnings pile is being kept completely covered. See attached photos. Turnings will be moved into an existing structure following completion of roadway construction anticipated to be completed next construction season.
	Accumulations of materials on the ground at dust	Improved and increased sweeping program. Retraining of employees and expanded inspection form.	Completed	Areas cleaned up, added to new inspection checklist, training completed. Improved dust collection and storage at baghouse locations. Posted temporary signs (permanent signs on order). See photos attached.
	Non-ferrous metal on the ground around the shredder			
4	Add erosion and sediment control to the SWPPP	Update SWPPP to include existing and proposed ESCMs. Site design and SWPPP Update to be completed.	01/16/2020	Topographic survey has been commissioned and should be completed by 11/15/2019. Design work for proposed facilities will follow and will be included in the modified SWPPP.
5	Unlabeled containers (spray bottles)	Label all containers. Retraining of employees.	Completed	The spray bottles in questions were removed and training completed on 10/25/2019
6	Expand employee training to include additional people including maintenance staff, SWPPP team, inspectors	Training of additional staff including maintenance staff and vehicle fleet manager	Completed	Training completed by Plumley on 10/25/2019 included shredder and fleet maintenance supervisors. A video training presentation is being prepared for further dissemination to staff.
7	Vehicle maintenance activities are not included in the SWPPP	Update SWPPP to include Sector P and submit NOI	01/16/2020	Sector P BMPs included on monthly inspections in the interim.
8	Various benchmark and effluent limit exceedances	Implement improved sweeping program and provide improved stormwater management facilities for outfall 002 and new outfall 003. Pond maintenance for outfall 001.	TBD	Construction of additional facilities would be completed during next construction season which is more time than the 180 days in the order. Regarding the existing pond, we believe these exceedances were likely attributable to the Microfines plant operation and storage directly adjacent to the pond. Since the Microfines project has been decommissioned, we are proposing to reevaluate the need for improvements until after additional sampling results are available. Next sampling is in November or December 2019.

WEITSMAN SHREDDING
USEPA Inspection and Order - September 2019
POTENTIAL NON-COMPLIANCE ITEMS AND AREAS OF CONCERN

TABLE 1 - PROPOSED ACTIONS AND SCHEDULE

Item	Action Needed	Schedule	Status	
9	Discolored discharge from outfall 001 noted in 3rd quarter of 2018	Submit corrective action form, perform corrective action.	Completed	Included with 10/17/2019 response
10	No discharge reported from outfall 001 in first half 2019 and 002 in 4th quarter 2018.	Observe outfalls more frequently using on site personnel. Train on site personnel to collect samples and complete forms.	12/31/2019	During the next sampling event (this Fall) on site personnel will trained in sample collection, inspection and documentation procedures.
<u>Areas of Concern</u>				
11	Drainage swale north of new maintenance garage addition	Include outfall north of maintenance garage in the SWPPP	TBD	See response to #7 and #8.
12	September 2018 lab report for outfall 002 shows mercury exceedance but no discharge reported	Explanation: Sample was collected by Plumley from small retention pond which is not representative of the discharge. No discharge was occurring at the time of the inspection. Plumley sampler retrained to collect representative samples.	Completed	Also note the response to item #10.
13	SWPPP was on site but not signed	Sign the SWPPP	Completed	Copy of the signature page is attached.
14	Fuel truck not included in SPCC plan	Fuel truck operations will be added to the SPCC plan and will include appropriate secondary containment.	01/16/2020	Plan for adding secondary containment will be part of the updated SWPPP as well as the SPCC plan.
15	SWPPP Site map did not include silt fence, dust collectors, new outfall.	Update site map	01/16/2020	To be included in updated SWPPP.
16	Gas cylinders not chained in place	Properly chain all gas cylinders. Retraining of employees and expanded inspection form.	Completed	Photo documentation submitted on 7/12/2019. Expanded monthly inspection form includes this.
17	Drums of used oil and possible pesticides stored outside	Store containers inside. Retraining of employees and expanded inspection form.	Completed	Photo documentation submitted on 7/12/2019. Expanded monthly inspection form includes this.
18	Provide information on wastewater treatment plant - diagram and last use	Provide WWTP diagram and last use (August 2016)	Completed	Included with 10/17/2019 response
19	Provide additional documentation (sweeper logs, QVMs and monitoring records for 2019, corrective action forms for 2018 and 2019	Provided in October 17, 2019 response	Completed	Included with 10/17/2019 response

ROUTINE INSPECTION OF BMPs

Facility: **FLEET MAINTENANCE AREA at WEITSMAN SHREDDING**

Date/Time: ___/___/___ :___ AM or PM

One Recycle Drive, Owego

Inspector: _____

BMPs	Check One	If Unsatisfactory, note Corrective Actions
Storage tanks inspected and inspection form completed.	<input type="checkbox"/> S <input type="checkbox"/> U	
Spill box at diesel tank is clean.	<input type="checkbox"/> S <input type="checkbox"/> U	
Tanker truck loading area is clean.	<input type="checkbox"/> S <input type="checkbox"/> U	
Spill cleanup supplies on hand at diesel tank.	<input type="checkbox"/> S <input type="checkbox"/> U	
No oil or liquids stored outside.	<input type="checkbox"/> S <input type="checkbox"/> U	
No leaking equipment stored outside or drip pans used and maintained.	<input type="checkbox"/> S <input type="checkbox"/> U	
No oil staining or spills in the parking areas	<input type="checkbox"/> S <input type="checkbox"/> U	
No washing equipment outside.	<input type="checkbox"/> S <input type="checkbox"/> U	
Access lanes and entrance swept periodically.	<input type="checkbox"/> S <input type="checkbox"/> U	
Spill cleanup supplies on hand in garage.	<input type="checkbox"/> S <input type="checkbox"/> U	
All containers labeled (drums, buckets, spray bottles, etc.)	<input type="checkbox"/> S <input type="checkbox"/> U	
Gas cylinders chained in place	<input type="checkbox"/> S <input type="checkbox"/> U	
Drain oil filters before recycling.	<input type="checkbox"/> S <input type="checkbox"/> U	

S-Satisfactory U-Unsatisfactory

ROUTINE INSPECTION OF BMPs

Facility: **SHREDDER AREA at WEITSMAN SHREDDING**

Date/Time: ___/___/____ ___:___ AM or PM

One Recycle Drive, Owego

Inspector: _____

BMPs	Check One	If Unsatisfactory, note Corrective Actions
Storage tanks inspected and inspection form completed.	<input type="checkbox"/> S <input type="checkbox"/> U	
No washing equipment outside?	<input type="checkbox"/> S <input type="checkbox"/> U	
Access lanes and entrance swept at least every day.	<input type="checkbox"/> S <input type="checkbox"/> U	
Rail car loading area swept at least every day.	<input type="checkbox"/> S <input type="checkbox"/> U	
Wire chopper baghouse dust collected and area cleaned daily.	<input type="checkbox"/> S <input type="checkbox"/> U	
Scrap and residual materials located away from standing water and ponds.	<input type="checkbox"/> S <input type="checkbox"/> U	
Turnings exposed to cutting fluids stored under cover or inside.	<input type="checkbox"/> S <input type="checkbox"/> U	
Adsorbents used for areas where potential sources of residual fluids.	<input type="checkbox"/> S <input type="checkbox"/> U	
Mercury spill kits on hand.	<input type="checkbox"/> S <input type="checkbox"/> U	
No excess water in shredder area requiring operation of WWTP.	<input type="checkbox"/> S <input type="checkbox"/> U	
Silt fence in swales and unpaved areas maintained.	<input type="checkbox"/> S <input type="checkbox"/> U	
Stormwater retention basins condition - any floating oil or sheens.	<input type="checkbox"/> S <input type="checkbox"/> U	
Stormwater retention basins condition - effluent clear, no sheen	<input type="checkbox"/> S <input type="checkbox"/> U	

S-Satisfactory U-Unsatisfactory

A photograph of a construction site. In the foreground, a large, rough-textured concrete wall is visible. A white rectangular sign with a black border is attached to the wall. The sign contains the text "ALL TURNINGS MUST BE TARPED AT ALL TIMES" in blue, all-caps, sans-serif font. To the left of the wall, a large pile of material is covered with a grey tarp. In the background, there are bare trees and a cloudy sky.

ALL
TURNINGS
MUST BE
TARPED AT
ALL TIMES





DUST
COVER
MUST BE
ON WHEN
RUNNING







FILLING STATION
SALES & SERVICE

Empty





SWEEP
AREA
AS
NEEDED

11.0 FACILITY CERTIFICATION

11.1 Documentation of Permit Eligibility Related to Endangered Species

This facility has not expanded its perimeter of operations. Therefore, per MSGP Section III.C.8, no endangered species documentation requirements apply.

11.2 Documentation of Permit Eligibility Related to Historic Places

This facility has not expanded its perimeter of operations. Therefore, per MSGP Section III.C.9, no historic places documentation requirements apply.

11.3 Certification of Non-Stormwater Discharge

Outfalls have been and will continue to be evaluated for the presence of non-stormwater on an annual basis.

11.4 Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

E.J. Watson
Name

VP Shredding operations
Title

E.J. Watson
Signature

10/31/19
Date